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August 27, 2020

BY ECF

Hon. Judge George B. Daniels  
United States District Court Judge  
United States District Court  
Southern District of New York  
40 Foley Square / Courtroom 11A  
New York, NY 10007

Re: *Needelman v. Otis Elevator Company, Inc.*  
18-7157 (GBD)

SEP 01 2020

SO ORDERED

The initial conference is  
adjourned from September 9,  
2020 to December 9, 2020 at  
9:30 a.m.

*George B. Daniels*  
HON. GEORGE B. DANIELS

Hon. Judge Daniels,

I represent the plaintiff in the above matter. The parties have requested and exchanged extensive paper discovery consisting of thousands of pages of documents and ESI and completed five depositions, including a non-party witness. Additionally, the parties have supplemented their document productions based on information that came to light during these depositions. Due to the current COVID-19 pandemic, the parties are nearly complete supplementing their document productions. Furthermore, the parties have had continued discussions towards a potential resolution and exchanged additional information to aid in this process.

Consequently, the parties request a 60 day adjournment of the September 9, 2020 conference with Your Honor so that we can continue our discussions towards resolution and complete supplementing our written discovery productions based on the testimony given by those previously deposed.

Thank you for your consideration.

Respectfully submitted,

*[Signature]*  
RAYMOND NARDO, ESQ.

RN:rn

cc: Howard Wexler, Esq. (by ECF)